

**From:** [Greg Powell](#)  
**To:** [Gary Moore](#)  
**Subject:** Re: Fw: Delta Shipyards - Looking at the Sampling Data - consideration of future actions  
**Date:** 12/05/2012 05:22 AM

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Hi Gary:

The treatability is needed. Fly ash may be the best bet, but quicklime /cement should be evaluated. The problem with lime addition is that the higher pH's can sometimes re-mobilize the metals; however, a treatability study will give us that data.

No issues with John's comments.

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USEPA-Environmental Response Team  
Cincinnati, Ohio  
(513)569-7533  
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▼ Gary Moore---12/04/2012 01:28:20 PM---Greg: Take a look and tell me what you think?

From: Gary Moore/R6/USEPA/US  
To: "Greg Powell" <powell.greg@epa.gov>  
Date: 12/04/2012 01:28 PM  
Subject: Fw: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

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Greg:

Take a look and tell me what you think?

Gary Moore  
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EPA Region 6  
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----- Forwarded by Gary Moore/R6/USEPA/US on 12/04/2012 12:27 PM -----

From: John Halk <John.Halk@LA.GOV>  
To: "Wright, Jeff" <Jeff.Wright@WestonSolutions.com>  
Cc: Gary Moore/R6/USEPA/US@EPA, Todd Thibodeaux <Todd.Thibodeaux@LA.GOV>  
Date: 12/04/2012 11:14 AM  
Subject: FW: Delta Shipyards - Looking at the Sampling Data - consideration of future actions

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Jeff:



9522488

Pit sludge exhibits some metals and PAH contaminants, as expected with hydrocarbon waste from ship/barge cleanout operations. For treatability samples, it is recommended to test reagent blends of fly ash, bed ash, or cement/lime (Cem-Lime)— a mixture of Portland cement and hydrated lime. Cement/lime mixture is probably best choice – it sets quickly, gives good unconfined compressive strength (recommended 8 psi or better), and can be transported to the site and mixed with long arm excavator.

Collect samples from highest COC locations within the pits and be sure to include highest visual oily material, representative of solid/liquid matrix of the sludge.

It is important to note, that the treatability testing is just that, and we are not pre-judging any future actions as to whether to go ahead with removal activities (whether in-situ or off-site), do other stabilization activities, such as strengthening levees. We can later have meetings to discuss any future action.

Also I think it is okay to use the RECAP Industrial Soil Screening Level as a comparison value to EPA RSLs outside the pit areas. Performing a 95 percent UCL on the outside sample locations (exclusive of the pits) may eliminate the arsenic and PAH constituents at RECAP industrial screening levels. The state RECAP standard for Arsenic is 12 ppm, so running a 95UCL may eliminate the samples outside of the pits.

We can afford to be less conservative inside the pits since this material could be treated and solidified. Please feel free to contact Todd or myself to further discuss the site. All in all, the sampling data looks much better than we anticipated.

Thanks,  
John Halk, CHMM